

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

THE DOWNTOWN SOUP KITCHEN
d/b/a DOWNTOWN HOPE CENTER,

Plaintiff,

v.

MUNICIPALITY OF ANCHORAGE,
ANCHORAGE EQUAL RIGHTS
COMMISSION, and MITZI
BOLAÑOS ANDERSON, in her
Official Capacity as the Executive
Director of the Anchorage Equal
Rights Commission,

Defendants.

Case No. 3:21-cv-00155-SLG

DECLARATION OF SHERRIE LAURIE

I, Sherrie Laurie, declare as follows:

1. I am a citizen of the United States and a resident of the State of Alaska. I am competent to make this declaration and the facts stated herein are within my personal knowledge.
2. I am the Executive Director of The Downtown Soup Kitchen, also known as the Downtown Hope Center (“Hope Center”).
3. Hope Center is a private, nonprofit religious organization that provides free shelter, food, showers, clothing, laundry services, job-skills training, and religious instruction to Anchorage’s homeless.

Hope Center's Formation and History

4. Formed over thirty years ago, Hope Center today provides women's shelter services, daily meals, hot showers, laundry services, clean clothing, and culinary and bakery job-skills training to Anchorage's hungry and homeless.

5. Hope Center began with the vision of a few Anchorage church leaders who wanted to share God's love with Anchorage's homeless.

6. Hope Center started in a little red house on Fourth Avenue in downtown Anchorage, where it provided nearly 300 free cups of soup each day to homeless and low-income families. It also offered free hot showers, laundry services, and clean clothing in a yellow A-frame building next door to the soup kitchen. And today, Hope Center continues to provide free services to both men and women, including meals, laundry services, showers and job skills training.

7. In 2012, Hope Center moved into its new facility on Third Avenue in downtown Anchorage.

8. Hope Center serves everybody. Over the past 30+ years, Hope Center has assisted thousands of individuals and families from all walks of life, regardless of race, color, religion, national origin, age, sex, sexual orientation, gender identity, marital status, disability, or any other characteristic.

9. After moving into its new facility, Hope Center expanded its religious mission to help a nearby homeless shelter that often could not accommodate everyone needing shelter and that faced the difficult challenge of providing a safe shelter environment for homeless women, many of whom had been physically or sexually abused by men.

10. Hope Center agreed to take in and provide safe shelter to the overflow of homeless women.

Hope Center's Religious Mission and Beliefs

11. Hope Center's mission statement is: "Inspired by the love of Jesus, we offer those in need support, shelter, sustenance, and skills to transform their lives."

12. Hope Center's religious beliefs compel it to care for Anchorage's hungry and homeless. *See, e.g.*, James 1:27, NIV ("Religion that God our Father accepts as pure and faultless is this: to look after orphans and widows in their distress and to keep oneself from being polluted by the world."); Matthew 25:40, NIV ("The King will reply, 'Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me.'").

13. Hope Center fulfills its religious mission and purpose both through acts of service and through teaching Christian beliefs and values.

14. Hope Center provides its guests with Christian counseling, teaching, and advice.

15. Thus, all Hope Center guests must be willing to be exposed to Hope Center's Christian beliefs and to not disrupt meetings where those beliefs are shared and taught.

16. Such activities include, but are not limited to, group prayer before meals, Bible studies, group devotions, Christian music and television, signs and decor with Christian messages, teachings, and symbols.

17. Hope Center encourages its guests to put their faith in Jesus Christ, whose love brings spiritual salvation and freedom from destructive situations, habits, and addictions.

18. As a Christian organization, Hope Center believes and follows the Bible's teachings.

19. Hope Center believes the Bible teaches that:

- It should cherish, respect, and protect women and should care for women who lack shelter;
- God creates people male or female;
- A person's sex (male or female) is an immutable God-given gift;
- It is wrong for a person to deny his or her God-given sex;
- Providing shelter to homeless women plays a critical role in their understanding of God's design for them;
- It must convey and promote truthful messages about God's creation of each unique individual, whether male or female, and must not convey conflicting messages;

- It must be loving, upfront, and honest in its interactions with others.

20. Hope Center teaches and expresses its religious beliefs, including its beliefs about sexuality and gender, throughout its Bible studies, group devotions, and other programs and activities that it offers to guests.

Hope Center's Women's Shelter

21. Each night, Hope Center houses up to 50 women.

22. Most of the women served by Hope Center's shelter have suffered rape, physical abuse, or domestic violence at the hands of men, or are fleeing sex trafficking.

23. Many women return to Hope Center night after night because they have nowhere else to go.

24. Because space is limited, the women must set up their sleeping areas, side-by-side, on the floor of a single room; they sleep three to five feet from each other:



25. Many women who stay overnight at the shelter can be seen changing their clothes or in various states of undress.

26. Because of its religious beliefs and desire to create a safe and secure environment, Hope Center allows only biological women to stay overnight at the shelter.

27. Allowing a biological man to sleep with and disrobe next to abused and battered women threatens the women's safety, privacy, and sense of security and therefore interferes with Hope Center's ministry to those women.

28. Women who use the shelter have told Hope Center officials that they would not feel safe if they had to sleep and/or undress next to biological men.

29. Women have told Hope Center officials that given past trauma they would rather sleep outside, without any shelter, than sleep in the same area as a biological man.

30. Other homeless shelters in the Anchorage area accept biological men.

31. Hope Center has and will continue to direct any biological men who seek access to its women's shelter to those other shelters.

32. No Hope Center policy prohibits biological women who identify as men from accessing the shelter, and Hope Center has previously allowed biological women who identify as men to access its shelter.

33. Hope Center previously posted and published the following admissions policy for its women's shelter:

The Downtown Hope Center believes that all people deserve love and respect. Our mission states 'Inspired by the love of Jesus we offer those in need support, shelter, sustenance and skills to transform their lives.' Because of our desire to provide a safe and warm environment for women, guests of the shelter must be biological females. It is against our policy for biological males to spend the night at our women-only facility, however we may be able to assist you in finding an alternative place to stay the night. Please contact one of our staff members if you need assistance.

34. Hope Center posted and published this policy for two main reasons: (1) to provide clarity and peace of mind to the women seeking refuge from the harsh conditions of homeless life; and (2) to follow its religious beliefs about being upfront and honest with those seeking access to the shelter.

35. Because of its religious beliefs, Hope Center desires to make its admissions policy clear by posting it on its grounds and on its website.

36. To avoid additional risk of liability, however, Hope Center has stopped posting its admissions policy on its grounds and on its website.

37. Hope Center has been forced to remove this admissions policy from its website and to otherwise refrain from posting or publishing the policy anywhere else.

38. Hope Center's religious beliefs require it to continue its policy of allowing only biological females into its women's shelter.

39. Hope Center cannot and will not comply with AMC §§ 5.20.020 and 5.20.050 to the extent that those laws require Hope Center to admit biological males into its women's shelter, since doing so would jeopardize the safety and security of vulnerable women and violate Hope Center's sincerely held religious beliefs.

The "Doe" Incident & Prior Commission Complaints

40. In January 2018, "Jessie Doe"¹ was dropped off at Hope Center by Anchorage police officers.

41. I was called to the dining hall, which also serves as the sleeping area for the women's shelter, to determine how best to help Doe.

42. Doe smelled strongly of alcohol, had an open eye wound, and seemed agitated and aggressive.

¹ Doe's real name is not disclosed here for privacy reasons.

43. Because Hope Center did not admit individuals who are inebriated, under the influence of alcohol or drugs, Doe could not stay at Hope Center.

44. I recommended that Doe seek medical treatment and paid for Doe's cab ride to the hospital.

45. I prayed with Doe; Doe hugged me; and I put Doe in the cab.

46. When "Jessie Doe" asked to stay at the women's shelter, several women told me that they would have left the shelter that night had Hope Center allowed Doe to stay.

47. Hope Center did not see Doe again that evening.

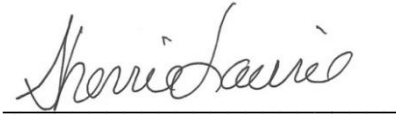
48. I later learned that Doe had started a fight at another shelter and that the police had been called to handle the situation, resulting in Doe's temporary ban from that shelter.

49. The next day (a Saturday), Doe again arrived at Hope Center and asked to be admitted to the women's shelter.

50. Hope Center declined admission because Doe had not stayed at the shelter the previous evening, a condition for Saturday admission, and because Hope Center was not accepting new shelter guests at that time.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing facts are true and correct to the best of my knowledge.

Executed on the 13th day of July, 2021.

A handwritten signature in cursive script, reading "Sherrie Laurie", positioned above a horizontal line.

Sherrie Laurie